

Woodward-Clyde**FAX TRANSMITTAL****4582 South Ulster Street****Denver, Colorado 80237****Return FAX Number is (303) 694-3946****CONFIDENTIALITY NOTICE:**

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For Immediate Delivery**TO:** Dolly Potter**Company:** CNE of Little America**Phone Number:** _____**FAX Number:** 307 775 8425**FROM:** Dario Garcia**Total Pages (including Cover Sheet):** 3**Date:** Nov 21**Phone Number:** 303 740 3872**Message:** HERE IS THE REVISION WIND.

I will plan to meet you
in the coffee shop at the
DEA office Bldg next
8:15 am

Shaker
Dario

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SECTION ONE

Introduction

1.1 PROJECT DESCRIPTION

The existing Soda Ash production plant will be expanded and modified within the same property boundaries to allow an additional 1.2 million tons per year (TPY) of Soda ash production. This will increase the total production to approximately 3.6 million TPY. The proposed modification will include a new shaft and hoist to recover ore from the mine, a new crusher and screens, and an additional covered storage area for 50,000 tons of ore. A fourth crusher will be added to the existing crusher facility, and a new calciner capable of calcining 400 tons/hr of ore and having a heat input capacity of 400 Mbtu/hr will be installed and equipped with a new Electrostatic precipitator (ESP). The new line for processing the ore will include three mechanical vapor recompressive (MVR) Crystallizers, filters and a Natural Gas fired dryer. The dryer will have a capacity of approximately 200 million BTU/hr, and will be controlled with an ESP. Additional product storage facilities will be constructed, but the loadout facility will not be changed, except that now it will operate almost continuously.

The modifications will be phased over approximately five (5) years. During the second quarter of 1999 the first phase will be completed by bringing on-line the 4th crusher for the existing crusher facility, the new calciner, the dryer and one of the three proposed MVR crystallizers. This will allow an increase in production of approximately 400,000 TPY.

In January of 2001, the second phase will be completed with the installation of the second MVR crystallizer, the new primary crusher and screens, the ore storage area and the new product silos. This will also increase production by approximately 400,000 TPY.

In January of 2003, the third MVR crystallizer will be brought on line resulting in the final production increase of 400,000 TPY.

The proposed modifications will result in an increase of particulate emissions, both total suspended particulate (TSP) and particulate matter less than 10 microns in diameter (PM_{10}), an increase of Nitrogen Oxides (NO_x) emissions, and an increase of Volatile Organic Compounds (VOCs) emissions in excess of the deMinimus emission levels set for existing major stationary sources. Recently, the project has modified the fuel and burners on the existing calciners, resulting in a reduction of approximately 600 TPY of NO_x emissions. Considering this recent reduction to offset the proposed increase will result in a net decrease in the total amount of NO_x emissions from the project. As a result, PSD permitting requirements and review are triggered for the particulate emissions and the VOC emissions only.

Emissions of other criteria pollutants, sulfur dioxide (SO_2), and carbon monoxide (CO) are below the deMinimus emission levels and are not subject to PSD review.

1.2 MODELING PROCEDURE

This protocol details the procedures that will be followed in the modeling analysis. This analysis will follow guidelines established by the Wyoming Department of Environmental Quality (WDEQ). In general, air quality modeling will be performed to show compliance with the following:

- PSD increments for PM_{10} ,

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- NAAQS for all criteria pollutants, and
- Wyoming specific standards (i.e., 24-hour TSP, 24-hour SO₂, etc.)

Although the project will result in an increase in VOC emissions, no modeling demonstration is proposed because there is not an accepted methodology that adequately addresses the complex interactions of VOC's in the atmosphere. HAPs will be addressed separately even though there are no Federal Class I areas located within 100 Kilometers of this site. The project intends to provide an assessment of the potential impact to visibility using a screening model (VISCREEN). In addition, the project will identify the maximum distance at which the potential impacts drop below the Class I area significant impact levels.